

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YOUFIT HEALTH CLUBS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-12841 (MFW)

(Jointly Administered)

Objection Deadline: February 8, 2021, at 4:00 p.m. (ET)
Hearing Date: Only if Objections are filed

NOTICE OF FEE APPLICATION

PLEASE TAKE NOTICE that Greenberg Traurig, LLP, counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”) filed the *Second Monthly Fee Application of Greenberg Traurig, LLP, Counsel for the Debtors, for Allowance of Compensation for Services Rendered and Reimbursement of Expenses for the Period From December 1, 2020 Through December 31, 2020* (the “**Application**”), with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that any response or objection to the Application must be filed with the Court on, or prior to, **February 8, 2021 at 4:00 p.m. (prevailing Eastern Time)** and served upon: (i) the Debtors’ chief restructuring officer, Phoenix Management Services, 535 Fifth Avenue Suite 1006 New York, NY 10017 (Attn: Brian Gleason (bgleason@phoenixmanagement.com)); (ii) the Debtors’ counsel, Greenberg Traurig, LLP at (a) The Nemours Building, 1007 North Orange Street, Suite 1200, Wilmington, DE 19801 (Attn: Dennis Meloro (melorod@gtlaw.com)) and (b) 77 West Wacker Dr., Suite 3100 Chicago, Illinois 60601 (Attn: Nancy A. Peterman (petermann@gtlaw.com), Eric J. Howe (howee@gtlaw.com), and Nicholas E. Ballen (ballenn@gtlaw.com)); (iii) counsel for the prepetition lenders and administrative and collateral agent and postpetition lenders and administrative and collateral agent, Winston & Strawn LLP, 200 Park Avenue, New York, NY 10166 (Attn: Carey D. Schreiber (cschreiber@winston.com) and Gregory Gartland (ggartland@winston.com)); (iv) the Office of

¹ The last four digits of YouFit Health Clubs, LLC’s tax identification number are 6607. Due to the large number of debtor entities in these chapter 11 cases, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the claims and noticing agent at www.donlinrecano.com/yfhc. The mailing address for the debtor entities for purposes of these chapter 11 cases is: 1350 E. Newport Center Dr., Suite 110, Deerfield Beach, FL 33442.

the U.S. Trustee (Attn: Hannah McCollum, Esq. (hannah.mccollum@usdoj.gov)); and (v) counsel to the Official Committee of Unsecured Creditors appointed in these chapter 11 cases, Berger Singerman LLP, 1450 Brickell Avenue, Suite 1900, Miami, FL 33131 (Attn: Brian G. Rich (brich@bergersingerman.com) and Michael J. Niles (mniles@bergersingerman.com)), and Pachulski Stang Ziehl & Jones LLP, 919 N. Market Street, 17th Floor, Wilmington, DE 19801 (Attn: Bradford J. Sandler (bsandler@pszjlaw.com) and Colin R. Robinson, Esq. (crobinson@pszjlaw.com)).

PLEASE TAKE FURTHER NOTICE THAT PURSUANT TO THE ADMINISTRATIVE ORDER ESTABLISHING PROCEDURES FOR MONTHLY, INTERIM, AND FINAL COMPENSATION AND REIMBURSEMENT OF EXPENSES OF PROFESSIONALS RETAINED IN THESE CHAPTER 11 CASES [DOCKET NO. 202], IF NO OBJECTIONS ARE FILED AND SERVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, THE DEBTORS WILL BE AUTHORIZED TO PAY 80% OF THE REQUESTED FEES AND 100% OF THE REQUESTED EXPENSES WITHOUT FURTHER ORDER OF THE COURT. ONLY IF AN OBJECTION IS PROPERLY AND TIMELY FILED IN ACCORDANCE WITH THE ABOVE PROCEDURES, WILL A HEARING BE HELD ON THE APPLICATION BEFORE THE HONORABLE MARY F. WALRATH AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM NO. 4, WILMINGTON, DELAWARE 19801.

[Signature Page Follows]

Dated: January 25, 2021
Wilmington, Delaware

GREENBERG TRAURIG, LLP

By: /s/ Dennis A. Meloro
Dennis A. Meloro (DE Bar No. 4435)
The Nemours Building
1007 North Orange Street, Suite 1200
Wilmington, Delaware 19801
Telephone: (302) 661-7000
Facsimile: (302) 661-7360
Email: melorod@gtlaw.com

-and-

Nancy A. Peterman (admitted *pro hac vice*)
Eric Howe (admitted *pro hac vice*)
Nicholas E. Ballen (admitted *pro hac vice*)
77 West Wacker Dr., Suite 3100
Chicago, Illinois 60601
Telephone: (312) 456-8400
Facsimile: (312) 456-8435
Email: petermann@gtlaw.com
howee@gtlaw.com
ballenn@gtlaw.com

Counsel for the Debtors and
Debtors in Possession